

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS  
CORPORATION, *et al.*<sup>1</sup>

)  
)  
) Chapter 11

)  
) Case No. 20-22476-mg

)  
) (Jointly Administered)  
)  
)  
)

---

**JOINT STIPULATION AND ORDER BETWEEN MOVIE COMPANY CLAIMANTS  
AND DEBTOR**

1. WHEREAS Movie Company Claimants<sup>2</sup> produced certain documents with start Bates Numbers MOVIE723101, MOVIE723079, MOVIE722489 and MOVIE722842 (collectively, “Contracts”) to Debtor Frontier Communications Corporation (“Frontier”) with redactions marked as attorney-client privilege.

2. WHEREAS, Frontier contends that the Contracts are not privileged and should not have been produced with redactions for attorney-client privilege.

3. WHEREAS, in the spirit of compromise, Movie Company Claimants are willing to

---

<sup>1</sup> Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.primeclerk.com/ftc>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

<sup>2</sup> Claimants Voltage Holdings, LLC; Backmask, LLC; Union Patriot Capital Management, LLC; Venice PI, LLC; Bedeviled, LLC; MON, LLC; Colossal Movie Productions, LLC; WWE Studios Finance Corp; TBV Productions, LLC; Definition Delaware LLC; I Am Wrath Productions, Inc.; Hannibal Classics Inc.; Justice Everywhere Productions LLC; Badhouse Studios, LLC; After Productions, LLC; Rise Up, LLC; Status Update LLC; Morgan Creek Productions, Inc.; Shock and Awe, LLC; Fun Mom Dinner, LLC; Dead Trigger Movie, LLC; YAR Productions, Inc.; Gunfighter Productions, LLC; Ace in the Hole Productions, LP; SF Film, LLC; The Rest of Us, Inc.; Killing Link Distribution, LLC; Cell Film Holdings, LLC; Dallas Buyers Club, LLC; Screen Media Ventures, LLC; Rambo V Productions, Inc.; Millennium Funding, Inc.; Millennium IP, Inc.; LHF Productions, Inc.; UN4 Productions, Inc.; Millennium Media, Inc.; Bodyguard Productions, Inc.; Hunter Killer Productions, Inc.; Fallen Productions, Inc.; HB Productions, Inc.; Laundry Productions, Inc.; Black Butterfly Film, LLC; AMBI Distribution Corp.; Dubious Productions, Inc.; Rupture CAL, Inc.; Future World One, LLC; Groove Tails Productions, LLC; Family of the Year Productions, LLC; Outpost Productions, Inc.; Nikola Productions, Inc.; Eve Nevada, LLC; After II Movie, LLC; and Wonder One, LLC (collectively, the “Movie Company Claimants”)

produce said Contracts to Frontier without said redactions under the highest confidential protection of the outstanding confidential order.

4. WHEREAS, Frontier agrees that by Movie Company Claimants providing said unredacted Contracts to Frontier, Movie Company Claimants have not waived the protections of the attorney-client privilege for their counsels' communications with Movie Company Claimants and/or their agents. Frontier further agrees not to argue that Movie Company Claimants or Movie Company Claimants' counsel or agents have waived the attorney-client privilege by producing the unredacted Contracts.

**NOW, THEREFORE, IT IS HEREBY ORDERED AS FOLLOWS.**

1. Movie Company Claimants shall produce the Contracts and there shall be no resulting waiver of the attorney-client privilege.

DATED: New York, New York  
April 23, 2024

/s/ Kerry S. Culpepper  
Kerry S. Culpepper  
CULPEPPER IP, LLLC  
75-170 Hualalai Road, Suite B204  
Kailua-Kona, Hawaii 96740  
Telephone: (808) 464-4047  
Facsimile: (202) 204-5181  
E-Mail: [kculpepper@culpepperip.com](mailto:kculpepper@culpepperip.com)

*Attorney for Movie Company Claimants*

/s/ Matthew J. Letten  
Matthew J. Letten  
DAY PITNEY LLP  
225 Asylum Street  
Hartford, CT 06103  
Tel: (860) 275-0565  
Fax: (860) 331-8913  
E-mail: [mletten@daypitney.com](mailto:mletten@daypitney.com)

*Attorney for Debtor Frontier  
Communications Corporation*

**SO ORDERED:**

Dated: New York, New York  
April \_\_, 2024

\_\_\_\_\_  
Chief Judge Martin Glenn  
United States Bankruptcy Judge